



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, Ca. 94105

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MEMORANDUM

DATE:

Mar 27, 1991

SUBJECT: Preliminary Assessment Review

Facility: Omega Oil Company

PA date: Feb. 19, 1991

FROM: Ray Fox (H-3-3)

TO: Karen Schwinn  
Chief, Waste Compliance Branch

THROUGH: Nancy Lindsay, Chief, Corrective Action Section

L.B. 3/27/91  
Larry Bowerman, Chief, Alternative Technology Section

I. FACILITY DESCRIPTION

Facility Name: Omega Oil Company

Address: 2744 Pomona Blvd.

Pomona, CA

EPA ID Number: CAD 009 661 844

DoHS Region (if CA): Region 3

RWQCB Region (if CA): Region 4 (Los Angeles)

**I. FACILITY DESCRIPTION (cont.)**

**Brief Description of Facility Operations and Hazardous Waste Management:**

Omega began operations as a waste oil recycler in 1973, and discontinued operations in June 1982. In June 1983 it commenced operations as an oil refinery and is continuing in this business. Virgin oils are purchased from local refineries, mixed with chemical additives and then sold to commercial users. Any waste oils generated are picked up every 90 days by a transporter (Omega Waste).

The facility was listed as a TSDF in the RCRA database on May 3, 1990. Since this does not seem to be, or ever have been, a RCRA regulated facility, DHS Region 3 requested EPA Region 9 to delist the facility (letter to Stan Brown, August 31, 1989)

**General Description of Solid Waste Management Units (SWMUs), if known (indicate RCRA-regulated units with asterisk):**

Waste Oil Tank: 500 gallons

Current drum storage area:

Former drum storage area:

None RCRA regulated.

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II. **ENVIRONMENTAL SIGNIFICANCE** (based on review of PA and discussions with FIT contractor)

A. Preliminary HRS Range (obtain from FIT; indicate if unknown):

HRS = 12.51

Discussion of FIT Recommendations:

FIT recommends no further CERCLA action, which seems appropriate

B. Hazardous Waste Exposure Information

Instructions: Check all applicable. Circle letter indicating evidence of release as appropriate: D - documented evidence (e.g. analytical data), V - visual evidence (e.g. observed spills, stained soils, etc.), P - potential for release (e.g. past waste management practices suggest probable releases, known soil contamination has probably caused groundwater contamination. etc.). Specify documentation, who saw visual evidence, and/or rationale for potential release, if known.

\_\_\_\_\_ Imminent danger to public health/environment. Immediate action required; explain:

\_\_\_X\_\_\_ Release to soil.    D    V    P

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## II. ENVIRONMENTAL SIGNIFICANCE (cont.)

B. Hazardous Waste Exposure Information (cont.)

  X   Release to groundwater.   D    V   (P

  X   Release to surface water.   D   V   (P)

Release to air. D V P

High Potential for Migration (media: )

  X   Sensitive environmental receptors (endangered species, estuaries, etc.) Explain:

Habitats for California black rail, Western yellow billed cuckoo, and the Least bells vireo, exist within 4 miles of site. Possibility of any contaminants to habitats extremely small.

No releases

II. ENVIRONMENTAL SIGNIFICANCE (cont.)

Extent of Site Characterization (check one):

\_\_\_\_\_ minimal        X   extensive      \_\_\_\_\_ unknown

Exposure Considerations:

  X   Drinking water source at risk: surface or GW

Depth to GW   132 feet   GW flow direction:   SW  

GW flow gradient (if known \_\_\_\_\_)

Direction/Distance to nearby wells   4 miles  

\_\_\_\_\_ Fishing, recreation water source at risk

\_\_\_\_\_ Irrigation, livestock water source at risk

\_\_\_\_\_ Blowing dust;                      \_\_\_\_\_ Poor Site Security;  
nearby population                      nearby population

  X   Target Population < 4 miles (#, if known 100                      )

Exposure pathway(s)           groundwater          

C. Constituent Release Information

Released Hazardous Constituents of Concern and concentrations(see 40 CFR Section 261 Appendix VIII and Section 264 Appendix IX):

Spilled product oil, not waste oil

Soil samples showed TPH = 650 microgram/kg one area

TPH = 1,500 micrograms/kg second area

\*TPH= Total petroleum Hydrocarbons

Released Hazardous Wastes of Concern (listed/characteristic):

Volume of Waste Released (if known):

Toxicity of Waste (if available from HRS package):

## II. ENVIRONMENTAL SIGNIFICANCE (cont.)

Additional considerations related to environmental significance:

About 20 square feet of contaminated soil (product spill) in unpaved area of the site was observed. In 1990 visibly contaminated soil was excavated and removed. DHS will observe further removal until all contaminated soil removed. Final cleanup and closure expected this year.

## III. SITE ENVIRONMENTAL PRIORITY

Instructions: Assign priority based on technical considerations only. Final priority should be briefly explained in terms of potential exposure to human health and the environment based on the technical considerations in Section II.

### \_\_\_\_\_ High Priority

\* Known or suspected release which has resulted in, or which has high potential for, exposure to human population and/or sensitive environments, in the short term ( < 10 years).

\* Rough Guideline: Preliminary worst case HRS score > 25

### \_\_\_\_\_ Medium Priority

\* Known or Suspected release with potential for exposure to human health or sensitive environments in the long term ( > 10 years).

\* Rough Guideline: Preliminary worst case HRS score between 16 and 25

### *M* *X* \_\_\_\_\_ Low Priority

\* Known or suspected release, but unlikely adverse effect on human health or the environment.

\* Rough Guideline: Preliminary worst case HRS Score between 5 and 15

### \_\_\_\_\_ No Further Action

\* No evidence of a release that could adversely affect human health or the environment.

III. SITE ENVIRONMENTAL PRIORITY (cont.)

Comments/Rationale:

Small spill of product oil has low potential of migration. DHS is supervising removal of all contaminated soil. No other known or suspected releases.

IV. RCRA PERMITTING STATUS

A. Contact Person(s):

Name	Date Contacted	Phone	Agency
1. Tom Kelly	03-18-91	4-2067	EPA-Permits
2. Matt Peterson	03-26-91	818 567 3096	State-Permits
3.			RWQCB (CA only)
4.			Other (specify)
5.			

B. Current Status (mark all applicable):

Instructions: For source, indicate file document or numeral for contact person listed above.

\_\_\_\_\_ Operating RCRA TSDF; Source:

\_\_\_\_\_ Not Operating RCRA TSDF; Source:

\_\_\_\_\_ Bankrupt Facility; Source:

\_\_\_\_\_ Non-Notifying TSDF - should be a RCRA TSDF but didn't submit a Part A permit application  
Source:

X \_\_\_\_\_ Generator only - never operated as a TSDF  
Source: 2

IV. RCRA PERMITTING STATUS (cont.)

B. Current Status (cont.)

\_\_\_\_\_ Permitted TSDF or Seeking Permit;  
Source:

Date Permitted:\_\_\_\_\_ Agency:\_\_\_\_\_

Part B Permit Application Submitted? Y N

Permit Application Review Lead (circle)  
EPA STATE OTHER (specify)

Corrective Action in (draft) Permit? Y N

Expected Permit Issuance Date:

Permit Expiration Date:

Permit Renewal Application Submitted Y N

(Expected) Renewed Permit Issuance Date:

Renewed Permit Expiration Date:

\_\_\_\_\_ Closed or Closing Facility; Source:

Closure Plan Submittal (Expected) Date:

Closure Plan Review Lead (circle all applicable):  
EPA STATE OTHER (specify)

Closure Plan Approved? Y N Date:

Closure Certification Received? Y N

Clean Closed? Y N

Closure Certification accepted by EPA/DoHS? Y N

\_\_\_\_\_ Post-Closure permit; Source:

Post-Closure Permit Application Submitted?  
Y N

Post-Closure Permit Application Review Lead  
EPA STATE Other (specify)



IV. RCRA PERMITTING STATUS (cont.)

B. Current Status (cont.)

Corrective Action in (draft) Permit Y N NA

(Expected) Post-Closure Permit Issuance Date:

\_\_\_\_\_ Combination: some units closing, some seeking  
permit (i.e. partial closure). Source:  
Explain:

X Part A Withdrawal Candidate; Source: 2  
Explain:

Never operated as RCRA TSD. DHS recommended delisting 08-31-90

*(Site B, on the right, previously delisted in 1990)*

\_\_\_\_\_ RWQCB Waste Discharge Requirements requiring  
investigation and/or remediation in Effect (CA only)

Other Comments:

V. OTHER REGULATORY ACTIVITIES RELEVANT TO CORRECTIVE ACTION

A. Contact Person(s):

	Name	Date Contacted	Phone	Agency
6.	Gary Lance	03-26-91	4-2146	EPA-Enforcement (RCRA)
7.				EPA-CERCLA
8.				State-Enforcement
9.				State-Superfund
10.				RWQCB
11.				Other (specify)
12.				

B. Activity

Instructions: mark all applicable; note any pertinent outstanding violations.

\_\_\_\_\_ EPA Enforcement Action with Activities Relevant to  
Corrective Action; Source:  
Date:  
Explain:

V. OTHER REGULATORY ACTIVITIES RELEVANT TO CORRECTIVE ACTION (cont.)

X State Enforcement Action with Activities Relevant  
to Corrective Action; Source:  
Date: February 1991  
Explain:

DHS Corrective Action Order finalized. Omega to submit a state closure  
plan. Closure expected end 1991. *Yup, no state closure yet.*  
*and if it's not done by then...*

\_\_\_\_\_ Regional Water Board Order or WDR Requiring  
Corrective Action (CA only); Source:  
Date:  
Explain:

\_\_\_\_\_ Other Agency Enforcement Action with Activities  
Relevant to Corrective Action; Source:  
Date:  
Explain:

VI. OVERALL STATE LEVEL OF INVOLVEMENT IN CORRECTIVE ACTION

(based on state actions, level of state staff person's oversight)

Mark one:

☒ High ☐ Medium ☐ Low

Rationale:

Relative classification, only DHS taking action. *(Handwritten: 10/1/01)*

VII. FACILITY WILLINGNESS/ABILITY TO PERFORM CORRECTIVE ACTION

☒ Facility is cooperative

☐ Facility is uncooperative; Explain:

☐ Unknown

☐ Facility may be financially unable to complete work.  
Explain:

Other Comments:

VIII. **RECOMMENDATION FOR FURTHER ACTION** (mark all applicable)  
Instructions: Consider factors in Sections I - VII to arrive at final recommendation for further action.

- \_\_\_\_\_ Imminent and substantial danger to human health or the environment requires issuance of RCRA 7003 Order and/or CERCLA 106 Order.
- \_\_\_\_\_ Issue RCRA 3013 order. Release of hazardous waste presents a substantial hazard to human health or the environment (investigation only).
- \_\_\_\_\_ Refer to CERCLA for further follow-up.
- \_\_\_\_\_ Facility unwilling or unable to perform corrective action (explain in Section VII)
- \_\_\_\_\_ Other (e.g. mining waste, active superfund site, generator only, etc.)  
Specify:
- X\_\_\_\_\_ No further CERCLA action
- \_\_\_\_\_ Conduct an RFA
- \_\_\_\_\_ as prelude to expected corrective action order
- \_\_\_\_\_ as prelude to permit issuance
- \_\_\_\_\_ Use a 3007 letter to obtain more information regarding the following items (a subsequent recommendation must be made after the information is received):
- \_\_\_\_\_ Negotiate 3008(h) Consent Order
- Must have documented or probable release of hazardous wastes or constituents
  - Must be a RCRA TSDF that has interim status (i.e. not yet permitted, including illegal TSDF that should have had interim status.
  - For California, must not have a permit issued by DoHS between 1/13/83 and 11/8/84. Permits issued by DoHS between 11/9/84 and 1/31/86 are considered partial RCRA-equivalent permits; with respect to corrective action, facilities permitted between 11/9/84 and 1/31/86 have interim status.

VIII. RECOMMENDATION FOR FURTHER ACTION (cont.)  
(mark all applicable)

- \_\_\_\_\_ Incorporate corrective action into post-closure permit through 3004(u) and (v).
- \_\_\_\_\_ Incorporate corrective action into permit through 3004(u) and (v).
- \_\_\_\_\_ Include corrective action in closure plan (appropriate only for surface soil releases near regulated units)
- \_\_\_\_\_ Ongoing or planned State action is sufficient to address release(s). Defer to state or other agency lead (identify):

\_\_\_\_\_ No further RCRA action at present; re-evaluate next year.

4-7-81 X No further RCRA action.

4-7-81 X Other (specify): *Ref to H 21  
withdraw part A*

No further RCRA action except to delist, as recommended by state.

Comments:

VIII. RECOMMENDATION FOR FURTHER ACTION (cont.)

           Recommendation Accepted

Karen Schwinn 6/28/91  
Karen Schwinn  
Chief  
Waste Compliance Branch

When applicable, entity to perform RFA:

           State  
           FIT (CERCLA)  
           contractor (RCRA)  
           Other; specify:

Rochel Loftin  
cc: ~~Virginia Cummings~~, EPI Superfund Liaison, H-8-1  
Jesse Baskir, EPI Coordinator, H-4-4  
Jim Breitlow, Permits, H-3-2 (when appropriate)  
Stan Brown H-2-1

